

EXHIBIT A

Lift Stay Motions

The Lift-Stay Motions include:¹

1. *Motion of Brett Groves for Relief from the Automatic Stay to the Extent of Liability Insurance Proceeds* [Docket No. 334];
2. *Motion to Remove Stay* [Docket No. 344];
3. *Motion of Paul Clark and Jean Clark for Relief from the Automatic Stay to the Extent of Liability Insurance Proceeds* [Docket No. 358];
4. *Motion for Relief from Stay* [Docket No. 423];
5. *Motion of James Charles Howard for Relief from the Automatic Stay to the Extent of Liability Insurance Proceeds* [Docket No. 553];
6. *Motion of Gary W. Gibby for Relief from the Automatic Stay* [Docket No. 608];
 - a. *Reply in Further Support of Motion of Gary W. Gibby for Relief from the Automatic Stay* [Docket No. 1058];
7. *Motion of Amer Nasser and Omeira Ulloque for Relief from the Automatic Stay* [Docket No. 615];
8. *Motion of Paul R. Wyszynski for Relief from the Automatic Stay* [Docket No. 630];
9. *Emily Louro's Motion for Relief from Automatic Stay* [Docket No. 650];
10. *Motion of Lawrence Nowicki, for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code* [Docket No. 659];
11. *Motion for Relief from the Automatic Stay* [Docket No. 684];
12. *Motion of Jesse Isreal Newton for Relief from the Automatic Stay* [Docket No. 741];
13. *Motion of Jimmie and Janel Hubert for Relief from the Automatic Stay* [Docket No. 758];
14. *Motion of Donna Lee Daugherty for Order ... Modifying the Automatic Stay to Allow Continuation of Wrongful Death Litigation* [Docket No. 770];
15. *Motion of Susan Degenkolb for Relief from the Automatic Stay* [Docket No. 783];
16. *Motion of Anthony Martino for Orders Granting Relief from the Automatic Stay* [Docket No. 789];
17. *Motion of Kavir Moonilal-Singh from [sic] the Automatic Stay* [Docket No. 812];
18. *Motion of Jason E. Ellis, for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code* [Docket No. 829];
19. *Motion of William Litral for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code* [Docket No. 844];
20. *Jose Emilio Ronderos's Motion for Relief from the Automatic Stay* [Docket No. 877];

¹ For the avoidance of doubt, pursuant to this Objection, the Debtors object to any motion to lift the automatic stay filed by or on behalf of any plaintiff seeking to recover against the Debtors or under the Debtors' insurance policies, including the Auto Policy, whether or not such lift-stay motion is included in the foregoing list.

21. *Jacob Bazarov and Tamara Peirova's Motion for Relief from the Automatic Stay* [Docket No. 878];
22. *Sopia L. Goodman's Motion for Relief from the Automatic Stay* [Docket No. 879];
23. *Motion of James Alexander and Lisa Alexander for Relief from the Automatic Stay* [Docket No. 903];
24. *Motion of Seung Chung for Order Granting Relief from the Automatic Stay* [Docket No. 984];
25. *Motion of Shane Snider and Carla Maria Snider for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code* [Docket No. 991];
26. *Motion of Edgar Cancino for Relief from the Automatic Stay* [Docket No. 1022];
27. *Motion of Ahmed Elsamady for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code* [Docket No. 1028];
28. *Motion of Alexis McCully for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Docket No. 1035];
29. *Motion Phillip B. Deterding's Motion for Relief from the Automatic Stay* [Docket No. 1037];
30. *Motion of Jill Napiwocki for Relief from the Automatic Stay to the Extent of Liability Insurance* [Docket No. 1062];
31. *Motion of Derek Hall for Relief from the Automatic Stay to the Extent of Liability Insurance* [Docket No. 1118];
32. *Claimant's Motion to Lift Stay Order* [Docket No. 1134];
33. *Paul Edward Fowler's Motion for Relief from the Automatic Stay* [Docket No. 1169]; and
34. *Motion of Delores Jones for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code* [Docket No. 1181].